



3 December 2020

RE: Testimony to Howard County Maryland Historic Preservation Commission Hearing, Agenda item 5: HPC-20-83 – 8049, 8055, 8059, 8061 (Tiber Park) and 8069 Main Street; Vicinity of Maryland Avenue and Main Street; Vicinity of 3711 Maryland Avenue along Patapsco River, Ellicott City

## Preservation

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My name is Dr. Stephen McKenna. I'm a resident of the Ellicott City Historic District, but this evening I'm grateful for the opportunity to enter testimony before the Commission as a Board Member and on behalf of Preservation Howard County (PHC), a two-decades old non-profit committed to actively pursuing the protection and preservation of Howard County's historical, cultural, and natural heritage, and increasing public awareness of the value of our shared non-renewable resources such as historic buildings, and heritage landscape, and view scape. Advocating for the responsible stewardship of such resources is central to our mission.

## Board

*Tara H. Simpson*

*Martha Clark*

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*Steve McKenna*

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PHC has been supportive of the Safe and Sound plan as a vast improvement on earlier plans for very significant alteration to the Ellicott City Historic District and lower Main Street in particular, and of which the current application for certificate of approval is part. The position of PHC is that the Commission *should not*, at this point in time, issue a certificate of approval for the proposed demolition of the buildings in question and the construction of the proposed Maryland Avenue culvert and expanded terraced floodplain. Our reasons are as follows.

First, we needn't remind the Commission that the status of the project going forward hinges at present on determinations that will be made through the as yet incomplete Federal Section 106 process required by the National Historic Preservation Act of 1966. The project also hinges on approval from CSX. Without venturing any prediction as to how these critical factors affecting the project will play out, we note that it remains possible that either of them could significantly impact the feasibility and/or design of the lower Main culvert and terraced floodplain, with potentially important consequences for the necessity or superfluity of demolition and/or for the implementation of measures to mitigate impact not contemplated in the County's application. Indeed, at the November 9, 2020, Section 106 Consulting Parties meeting, at which PHC was a participant, it was indicated by the Army Corps of Engineers

representative that further consultation between the Corps, the County, and the Consulting Parties will almost certainly be necessary, particularly with respect to this lower Main project. It would be highly counter-productive, to say the least, then, for the Commission to approve the demolition of these structures for a project whose ultimate form remains subject to Section 106 review and CSX approval.

Secondly, notwithstanding such remaining hurdles, as to the structures proposed for demolition themselves, PHC holds that there can be no question that they are Structures of Unusual Importance as defined by the Commission's Rules of Procedure, regardless of their various historical ages and provenances, because of their very occupation of a site that constitutes an essential cornerstone to the lower Main streetscape and to the visually striking eastern entryway to the Historic District. To use the language of Section 302 of the Commission's Rules of Procedure regarding Structures of Unusual Importance, these are buildings "*whose loss would cause great damage to the character and integrity of the historic district.*"

In its application, the County itself notes that quote "the viewshed and streetscape at Lower Main Street will be altered from the way that most [people] living currently have experienced it." That signals a set of alterations with a *profound* historical impact. The County's rather narrow "experience-of-living-persons" historical horizon is, moreover, simply not relevant here. What's meant to indicate concern and thoughtfulness belies an impulse to minimize historical impact. Buildings have occupied all or part of this stretch of Main St. for much longer than a century, in some cases nearly twice that, possibly more. In this context, any plan to so radically alter the site must be held to the very highest standards for the mitigation of adverse impact to Structures of Unusual Importance. It is not clear, however, particularly under evolving project plans, that all mitigation possibilities have been fully explored, such as relocation and restoration of the Great Panes building at 8069, or such as retention of some or all of the building facades, whether as shallow but usable spaces (as has been planned for structures further up Main St.) or as aesthetic features that would help maintain the visual integrity and character of lower Main and this vital intersection as a whole, given its critical adjacency to the B. & O. Railroad Museum.

While acknowledging that the lower Main project is different in many respects from the projects now proposed in the West End and the Frederick Road Survey Area, we note with interest that just recently, modifications to project design involving flood mitigation in *those* areas of potential effect have led to the need for fewer building demolitions than originally planned. Postponement of any certification approval in this project is likewise appropriate, then, until *every* other alternative has

been fully explored, documented, and demonstrated as being ruled out by absolute necessity.

Were the Commission nevertheless to decide to move to approve the county's application at this time, PHC has additional concerns to register regarding salvage of historical elements of the buildings for preservation and/or inclusion in whatever future site design is finalized, regarding the inclusion of prominent and well-researched signage describing the history of this portion of lower Main, regarding additional protection needed for the foundationless Patapsco National Bank Building at the corner of Maryland Avenue and Mulligans Hill lane, as well as other related matters, but we will withhold those comments at present and/or submit them to the Commission in writing. Thank you.